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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATIONAL PRODUCTS, INC.,

Plaintiff,

V.

GAMBER-JOHNSON LLC,

Defendant.

Civil Case No. CV08-0049-JLR

STIPULATED MOTION TO FILE UNDER SEAL CERTAIN EXHIBITS TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTIONS IN LIMINE

Note on Motion Calendar: March 15, 2010

The parties move jointly for an order to file the following exhibits which are attached to the declaration of Patrick E. Premo filed in opposition to Defendants Motions in Limine. (Docket No. 122.)

**Exhibit B** contains excerpts of the November 18, 2009 deposition of Dr. David Eby. Dr. Eby's testimony contains business information of NPI regarding testing of laptop mounts.

**Exhibit C** contains excerpts of the January 13, 2010 deposition of Howard Pace and Richard Gardner, Rule 30(b)(6) witnesses for General Dynamics Itronix ("GDI"). It contains information of a confidential or proprietary nature according to the designation made by nonparty GDI.

1	Exhibit F contains excerpts of the October 26, 2009 expert report of Scott Hampton.
2	Mr. Hampton's report, which contains Gamber's confidential sales information. (See Dkt.
3	No. 126)
4	Exhibits H and M contain information of a confidential or proprietary nature
5	according to the designations made by Defendant Gamber.
6	Facts supporting the parties request to seal the foregoing exhibits are set forth in the
7	Declaration of Patrick E. Premo filed contemporaneously herewith.
8	Date: March 15, 2010 FENWICK & WEST LLP
9	
10	By: s/ David K. Tellekson
11	David K. Tellekson, WSBA No. 33523 Ewa M. Davison, WSBA No. 39524 Virginia K. DeMarchi ( <i>pro hac vice</i> )
12	Patrick E. Premo (pro hac vice)
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16	National Products, Inc.
17	Date: March 15, 2010  By: s/ Jonathan D. Jay
18	Date: March 15, 2010  By: s/ Jonathan D. Jay  Jonathan D. Jay  Nicholas S. Kuhlmann
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22	Email: jjay@ljp-iplaw.com  Attorneys for Defendant
23 Attorneys for Defendant Gamber-Johnson LLC	
24	

## CERTIFICATE OF SERVICE

1	CERTIFICATE OF SERVICE
2	I, Sharie L. Parks, hereby certify that on March 15, 2010, I caused the foregoin
3	PLAINTIFF'S MOTION TO FILE CERTAIN EXHIBITS TO ITS OPPOSITION TO
4	DEFENDANT'S MOTIONS IN LIMINE UNDER SEAL to be served on the following
5	parties as indicated below:
6 7 8 9	Mark S. Parris ORRICK HERRINGTON & SUTCLIFFE LLP 701 Fifth Avenue, Ste. 5700 Seattle, WA 98104-7097  Attorneys for Defendant Gamber-Johnson LLC  [ ] By United States Mail [ ] By Legal Messenger [X] By Electronic CM/ECF [ ] By Overnight Express Mail [ ] By Facsimile [ ] By Email [by agreement of counsel] mparris@orrick.com
10 11 12 13 14 15	Sy United States Mail   Sy Legal Messenger   Sy Legal Messenger   Sy Electronic CM/ECF   Sy Electronic CM/ECF   Sy Overnight Express Mail   Sy Electronic CM/ECF   Sy Overnight Express Mail   Sy Electronic CM/ECF   Sy Overnight Express Mail   Sy Enail   Sy Enail
16 17 18	DATED: March 15, 2010  s/ Sharie L. Parks for David K. Tellekson, WSBA No. 33523 FENWICK & WEST LLP

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